

AARON D. FORD
Attorney General
ALEXANDER J. SMITH (Bar #15484)
Deputy Attorney General
State of Nevada
Office of the Attorney General
555 East Washington Avenue
Suite 3900
Las Vegas, Nevada 89101
(702) 486-4070 (phone)
(702) 486-3773 (fax)
Email: ajsmith@ag.nv.gov

*Attorneys for Defendants
Pamela Del Porto, Harold Wickham,
Charles Daniels, Tara Carpenter,
Romeo Aranas, and Renee Baker*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

TRACY WAYNE VICKERS,
Plaintiff,

v.

HENRY GODECKI, *et al.*,
Defendants.

Case No. 2:20-cv-01401-GMN-NJK

**STIPULATION AND PROPOSED
ORDER TO EXTEND BY TEN DAYS
THE DEADLINE FOR
DEFENDANTS TO RESPOND TO
PLAINTIFF'S RULE 60(b) MOTION
(ECF NO. 30) FOR
RECONSIDERATION
(First Request)**

Defendants, Pamela Del Porto, Harold Wickham, Charles Daniels, Tara Carpenter, Romeo Aranas, and Renee Baker, by and through counsel, Aaron D. Ford, Attorney General for the State of Nevada, and Alexander J. Smith, Deputy Attorney General of the State of Nevada, Office of the Attorney General, and Plaintiff Tracy Wayne Vickers, by and through counsel Travis N. Barrick, hereby stipulate to extend by ten days the October 26, 2021 deadline for Defendants to respond to Vickers's Rule 60(b) motion (ECF No. 30) for reconsideration; Defendants shall respond no later than November 5, 2021.

At a meet-and-confer held earlier today, counsel for the defense informed counsel for the plaintiff that the former very recently assumed defense responsibilities for this action and several others following reallocation of cases within the Public Safety Division of the Attorney General's Office. Counsel for the defense requires an additional ten days in which to (i) familiarize himself with the action and all the filings on the docket to date and (ii) to conduct the necessary research to respond to Vickers's motion (ECF No. 30) in a manner that will ensure the court is briefed fully and is able to reach a sound legal resolution of the issues, especially considering that a motion under Rule 60(b), Federal Rules of Civil Procedure, is adjudicated in accord with equitable principles and thus relief is discretionary.

Therefore, the parties hereby stipulate to extend the current deadline for Defendants to respond to Vickers's Rule 60(b) motion (ECF No. 30) for reconsideration from October 26, 2021, to November 5, 2021. This stipulation is respectfully submitted by the parties in good faith and not for the purposes of delay on this 26th day of October, 2021.

AARON D. FORD
Attorney General

By: /s/ Travis N. Barrick
TRAVIS N. BARRICK (Bar #9257)
Gallian, Welker, & Beckstrom
Attorney for Plaintiff

By: /s/ Alexander J. Smith
ALEXANDER J. SMITH (Bar #15474)
Deputy Attorney General
Attorneys for Defendants

IT IS SO ORDERED.

Dated this 27 day of October, 2021.


Gloria M. Navarro, District Judge
UNITED STATES DISTRICT COURT